

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE: ) CHAPTER 13  
)  
MICHAEL LASHAN JACKSON, ) CASE NO.: 20-69639-JWC  
)  
Debtor. )

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**APPLICATION TO APPROVE EMPLOYMENT OF SPECIAL COUNSEL**

COMES NOW Michael Lashan Jackson (“Debtor”), and by and through the undersigned counsel respectfully requests that this Court approve the employment of ClassAction Law, PLLC dba Morgan & Morgan to represent Debtor as counsel of record regarding a personal injury claim. In support of this application, Debtor shows to this Court the following:

1.

On September 4, 2020, Debtor filed a Petition for relief under Chapter 13 of the Bankruptcy Code, Case Number 20-69639-JWC.

2.

On July 26, 2019, Debtor retained ClassAction Law, PLLC dba Morgan & Morgan as counsel to represent him in a personal injury claim for injuries.

3.

Debtor requests that the Court approve the employment of ClassAction Law, PLLC dba Morgan & Morgan for the express purpose of representing Debtor in his personal injury claim.

4.

Debtor has employed ClassAction Law, PLLC dba Morgan & Morgan for professional services and agreed to a payment agreement in contract to hire special counsel. All remaining compensation paid to Debtor is subject to approval by this Court. The attorney-client agreement between Debtor and Counsel are attached (attached hereto as Exhibit "A"). Debtor believes that approval of the employment of ClassAction Law, PLLC dba Morgan & Morgan would be in the best interest of the estate.

5.

Debtor acknowledges that that any money received or owed in the claim is subject to the approval of the Chapter 13 Trustee and the U.S. Bankruptcy Court.

6.

To the best of Debtor's knowledge, the proposed special counsel does not have any connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed by the office of the United States trustee (the "Relevant Parties") (see attached Affidavits of Counsel marked as Exhibit "B").

WHEREFORE, Debtor prays that the Court approve Debtor's employment of ClassAction Law, PLLC dba Morgan & Morgan in his personal injury claim as provided under Chapter 13 of the Bankruptcy Code.

Dated: November 11, 2020

Respectfully submitted,

/s/

Jonathan A. Proctor  
GA Bar No.: 890603  
The Semrad Law Firm, LLC  
235 Peachtree Street NE  
Suite 300  
Atlanta, Georgia 30303  
(678) 668-7160  
**Attorney for the Debtor**

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**CERTIFICATE OF SERVICE:**

I hereby certify that I am more than 18 years of age and that I have this day served a copy of the within Application to Approve Employment of Special Counsel upon the following by depositing a copy of the same in U.S. Mail with sufficient postage affixed thereon to ensure delivery:

Michael Lashan Jackson  
215 Northwind Drive  
Stockbridge, GA 30281

Morgan & Morgan, P.A.  
201 N. Franklin Street, 7<sup>th</sup> Floor  
Tampa, FL 33602

U.S. Trustee  
75 Ted Turner St., SW #362  
Atlanta, GA 30303

I further certify that, by agreement of parties, Nancy J. Whaley, Standing Chapter 13 Trustee, was served via ECF.

Dated: November 11, 2020

/s/  
Jonathan A. Proctor  
GA Bar No.: 890603  
The Semrad Law Firm, LLC  
235 Peachtree Street NE  
Suite 300  
Atlanta, Georgia 30303  
(678) 668-7160  
**Attorney for the Debtor**